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**From:** Rizzo, George [Rizzo.George@epa.gov]  
**Sent:** 7/1/2021 8:09:52 PM  
**To:** Rogers, Rick [rogers.rick@epa.gov]  
**CC:** Crumlish, Karen [Crumlish.Karen@epa.gov]; Stanmyer, Ruby [Stanmyer.Ruby@epa.gov]; Henry, JeannaR [Henry.Jeannar@epa.gov]; Libertz, Catherine [Libertz.Catherine@epa.gov]; Melvin, Karen [Melvin.Karen@epa.gov]; Zirilli, Alysa [Zirilli.Alysa@epa.gov]  
**Subject:** RE: Issue paper on Clarksburg, WV

Rick,

The short answer to your question is yes, partial lead service line replacements (PLSLRs) are allowed under the LCRR but with several caveats listed below:

- CWSs serving more than 10,000 people which exceed the lead AL must fully replace 3% of their LSLs for 4 consecutive 6-month monitoring periods. Only full LSLRs can be counted toward the replacement rate.
- CWSs serving more than 10,000 people with 90<sup>th</sup> percentile lead values greater than 10 but 15 or less, must implement a LSLR program in consultation with their primacy agencies for 2 consecutive 1-year monitoring periods.
- CWSs serving less than or equal to 10,000 people, and NTNCWSs which exceed the lead AL can choose, with primacy agency approval, to use corrosion control treatment, LSLR, or provision and maintenance of point-of-use devices to address the problem.

George

George S. Rizzo  
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**From:** Rogers, Rick <rogers.rick@epa.gov>  
**Sent:** Thursday, July 01, 2021 1:55 PM  
**To:** Rizzo, George <Rizzo.George@epa.gov>  
**Cc:** Crumlish, Karen <Crumlish.Karen@epa.gov>; Stanmyer, Ruby <Stanmyer.Ruby@epa.gov>; Henry, JeannaR <Henry.Jeannar@epa.gov>; Libertz, Catherine <Libertz.Catherine@epa.gov>; Melvin, Karen <Melvin.Karen@epa.gov>; Zirilli, Alysa <Zirilli.Alysa@epa.gov>  
**Subject:** RE: Issue paper on Clarksburg, WV

George,

Does the new, long-term revisions to the LCR still allow for partial LSL replacements?

Thanks,

Rick

Rick Rogers, Chief

Water Branch (3ED30)  
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**From:** Rizzo, George <[Rizzo.George@epa.gov](mailto:Rizzo.George@epa.gov)>  
**Sent:** Thursday, July 01, 2021 1:42 PM  
**To:** Rogers, Rick <[rogers.rick@epa.gov](mailto:rogers.rick@epa.gov)>  
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**Subject:** RE: Issue paper on Clarksburg, WV

Rick,

To get some background information on the Clarksburg Water Board issue, I reviewed the data that is in SDWIS/Fed pertaining to this system. I also looked at the Clarksburg Water Board's web site ([clarksburgwater.com](http://clarksburgwater.com)). Here's what I found:

- The PWS ID Number is WV3301705.
- The system was deemed to have optimal corrosion control treatment (OCCT) as of 4/1/1993. "Deemed OCCT" means that the designation was based on lead and copper tap samples rather than a corrosion control treatment study.
- During several rounds of initial tap sampling from 1992 to 1998, the 90<sup>th</sup> percentile (PB90) values ranged from 0.004 to 0.008 mg/L (4 to 8 ppb).
- The system began triennial monitoring in 1999 and continued this schedule through 2019. Although the compliance period for triennial monitoring spans 3 calendar years, the required 4-month tap sampling period is June 1 to September 30 during one of the 3 years. The sampling period cannot be more than 3 years after the sampling period of the previous triennial compliance period. The Consumer Confidence Report for 2020 posted on the Clarksburg Water Board web site states that the most recent LCR data is from 2019 which was the last year of their most recent compliance period. I believe that this means that samples were also collected during the last year of the previous compliance periods. Results are listed below:

<u>Compliance Period</u>	<u>PB90 mg/L</u>	<u>PB90 ppb</u>
01/01/1999 – 12/31/2001	0.007	7
01/01/2002 – 12/31/2004	0.010	10
01/01/2005 – 12/31/2007	0.006	6
01/01/2008 – 12/31/2010	0.0088	8.8
01/01/2011 – 12/31/2013	0.0065	6.5
01/01/2014 – 12/31/2016	0.0069	6.9
01/01/2017 – 12/31/2019	0.0053	5.3

- There are no 90<sup>th</sup> percentile (CU90) values for copper listed in SDWIS/Fed for this system. Only CU90 values that exceed the action level are required to be entered into SDWIS/Fed, so it is likely that the system has not exceeded the action level.

I have attached a report which I downloaded from SDWIS which includes information regarding the system and indicates that it has not incurred LCR violations in the past. The report indicates that the system is using pH adjustment to control corrosion but does not indicate at what level.

George

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**From:** Rogers, Rick <[rogers.rick@epa.gov](mailto:rogers.rick@epa.gov)>  
**Sent:** Thursday, July 01, 2021 7:56 AM  
**To:** Libertz, Catherine <[Libertz.Catherine@epa.gov](mailto:Libertz.Catherine@epa.gov)>; Melvin, Karen <[Melvin.Karen@epa.gov](mailto:Melvin.Karen@epa.gov)>  
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**Subject:** RE: Issue paper on Clarksburg, WV

Here's the corrected version of the briefing paper.

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**From:** Libertz, Catherine <[Libertz.Catherine@epa.gov](mailto:Libertz.Catherine@epa.gov)>  
**Sent:** Wednesday, June 30, 2021 5:44 PM  
**To:** Rogers, Rick <[rogers.rick@epa.gov](mailto:rogers.rick@epa.gov)>; Melvin, Karen <[Melvin.Karen@epa.gov](mailto:Melvin.Karen@epa.gov)>  
**Cc:** Crumlish, Karen <[Crumlish.Karen@epa.gov](mailto:Crumlish.Karen@epa.gov)>; Stanmyer, Ruby <[Stanmyer.Ruby@epa.gov](mailto:Stanmyer.Ruby@epa.gov)>; Henry, JeannaR <[Henry.Jeannar@epa.gov](mailto:Henry.Jeannar@epa.gov)>  
**Subject:** RE: Issue paper on Clarksburg, WV  
**Importance:** High

Thanks for the quick attention to this, folks.

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Thanks again!  
Cathy

Catherine A. Libertz, Director  
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USEPA Region III  
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**From:** Rogers, Rick <[rogers.rick@epa.gov](mailto:rogers.rick@epa.gov)>  
**Sent:** Wednesday, June 30, 2021 4:33 PM  
**To:** Melvin, Karen <[Melvin.Karen@epa.gov](mailto:Melvin.Karen@epa.gov)>; Libertz, Catherine <[Libertz.Catherine@epa.gov](mailto:Libertz.Catherine@epa.gov)>  
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**Subject:** Issue paper on Clarksburg, WV

See the attached issue paper regarding what we learned today about the potential lead in drinking water issue in Clarksburg, WV. WV Dept of Health is drafting an order to Clarksburg to require a number of things happen. We will schedule a call with WV DHHR for some time tomorrow to get an update and offer assistance, again.

## Ex. 5 Deliberative Process (DP)

Let us know if you have any questions.

Rick